

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

v.

PRC INDUSTRIES, INC., CORP. d/b/a  
PRODUCT REMANUFACTURING  
CENTERS INDUSTRIES, INC.,

Defendant.

Case No: 3:23-cv-00135-LRH-CSD

**ORDER GRANTING  
STIPULATION TO EXTEND  
TIME FOR DEFENDANT TO  
RESPOND TO MOTION TO  
INTERVENE (First Request)**

Defendant PRC INDUSTRIES, INC., d/b/a PRODUCT REMANUFACTURING CENTERS INDUSTRIES, INC., (“PRC”) by and through its attorney of record, REBECCA BRUCH, ESQ. of LEMONS, GRUNDY & EISENBERG, and THE GEDDES LAW FIRM, by and through its attorney of record, WILLIAM J. GEDDES, attorney of record for Plaintiff-Intervenors Roderick S. Woods and Tashia B. Woods, pursuant to Local Rule IA 6-1, hereby stipulate to extend the time for Defendant to respond to Plaintiff-Intervenors’ Motion to Intervene to May 12, 2023. This requested extension and stipulation is sought in good faith and not for the purposes of delay.

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## MEMORANDUM OF POINTS AND AUTHORITIES

### I. LEGAL AUTHORITY

Fed. R. Civ. P. 6(b)(1) governs the extension of time to respond to Motions. “When an act may or must be done within a specified time, the court may, for good cause, extend the time...” Fed. R. Civ. P. 6(b)(1). The “good cause” standard focuses primarily on the movant’s diligence. *Coleman v Quaker Oats Co.*, 232 F.3d 1271, 1294-95 (9th Cir. 2000).

#### A. Current Status of Complaint.

On March 28, 2023, Plaintiff EEOC filed its Complaint. *See ECF No. 1.* On March 31, 2023, Plaintiff filed a Request for Waiver of Service. *See ECF No. 4.* On April 7, 2023, Plaintiff-Intervenors filed a Motion to Intervene, and on April 8, 2023, Plaintiff-Intervenors filed a Notice of Erratum. *See ECF No. 6 and ECF No. 7.* Defendant had not yet made an appearance in this action. On April 12, 2023, Defendant executed the Waiver Of Service Of Summons and it was filed on that same date. *See ECF No. 8.* Defendant’s Answer is due May 30, 2023. A Response to the Motion to Intervene would have been due on April 21, 2023. Defendants became aware of the Motion to Intervene on April 26, 2023, after the due date for the Response to the Motion to Intervene. *See ECF No. 10.*

In Plaintiff-Intervenors’ Notice of Motion, they noted that they do not oppose allowing Defendant additional time to file a response to Plaintiff-Intervenors’ Motion to Intervene, in order to allow Defendant’s counsel to confer with her clients. *Id.*

Counsel for Plaintiff-Intervenors and Defendant have spoken and stipulate to an extension of time to respond up to and including May 12, 2023.

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1 Based on the foregoing, Plaintiff-Intervenors and Defendant request the Court to  
2 approve their stipulation for extension up to and including May 12, 2023.

3 Dated this 27<sup>th</sup> day of April, 2023.

4 LEMONS, GRUNDY & EISENBERG

5  
6 By: /s/ Rebecca Bruch  
7 REBECCA BRUCH, ESQ. (SBN7289)  
8 6005 Plumas St., Third Floor  
9 Reno, Nevada 89519  
10 *Attorneys for Defendant*

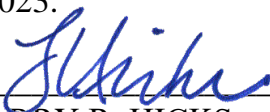
11 THE GEDDES LAW FIRM

12 By: /s/ William J. Geddes  
13 WILLIAM J. GEDDES, ESQ. (SBN6984)  
14 1575 Delucchi Lane, Suite 206  
15 Reno, NV 89502  
16 (775) 853-9455  
17 *Attorneys for Plaintiff-Intervenors*

18 **ORDER**

19 IT IS SO ORDERED that Defendant's Response to Plaintiff-Intervenor's Motion to  
20 Intervene is hereby extended to May 12, 2023.

21 DATED this 1<sup>st</sup> day of May, 2023.

22   
23 LARRY R. HICKS  
24 UNITED STATES DISTRICT JUDGE  
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